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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
QUINTIN JEUH CARLOS-BANUELOS,
Defendant.

CASE NO. 1:20-CR-00175-NODJ-BAM

STIPULATION TO VACATE TRIAL
CONFIRMATION HEARING AND TRIAL AS TO
QUINTIN JEUH CARLOS-BANUELOS AND SET
CASE FOR CHANGE OF PLEA AND ORDER
THEREON

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a trial confirmation hearing on April 29, 2024, and a trial on May 14, 2024.

2. By this stipulation, defendant now moves to vacate the trial confirmation hearing and trial as to QUINTIN JEUH CARLOS-BANUELOS and to **set the case for a change of plea hearing on March 18, 2024 at 9:00 a.m.** The proposed change of plea date represents the earliest date that all counsel are available, taking into account counsels' schedules, defense counsels' commitments to other clients, and the court's available dates for a change of plea hearing.

3. The parties agree and stipulate, and request that the Court find the following:

a) The discovery associated with this case includes voluminous investigative reports, wire interceptions recordings and electronic messages, precise location information data, and cellular phone downloads, totaling thousands of pages of discovery and

several gigabytes of electronic data.

b) Defense counsel requests the additional time to prepare for the change of plea hearing, meet with his client, and review/negotiate the plea agreement.

c) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Time has already been excluded beyond the proposed change of plea hearing date.

IT IS SO STIPULATED.

Dated: January 25, 2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

Dated: January 25, 2024

/s/ Victor Chavez
Attorney for Defendant
QUINTIN JEUH CARLOS-BANUELOS

ORDER

IT IS SO ORDERED that the jury trial set for May 14, 2024, and trial confirmation set for April 29, 2024 are vacated as to QUINTIN JEUH CARLOS-BANUELOS. A change of plea hearing is set for **March 18, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.** Time was previously excluded through May 14, 2024.

IT IS SO ORDERED.

Dated: January 25, 2024

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE